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11 *Additional counsel listed on signature page*

12 Attorneys for Defendants
13 Tesla, Inc. and Elon Musk
14

15 **IN THE UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

17 ALCON ENTERTAINMENT, LLC,
18 a Delaware Limited Liability Company,

19 Plaintiff,

20 v.
21

22 TESLA, INC., a Texas Corporation;
23 ELON MUSK, an individual;
24 WARNER BROS. DISCOVERY, INC.,
a Delaware Corporation,

25 Defendants.
26
27
28

Case No. 2:24-cv-09033-GW-RAO

**DECLARATION OF KRISTEN
MCCALLION IN SUPPORT OF
DEFENDANTS TESLA, INC. AND
ELON MUSK'S MOTION TO
DISMISS THIRD AMENDED
COMPLAINT**

*[Filed concurrently with Notice of
Motion and Motion to Dismiss Third
Amended Complaint and [Proposed]
Order]*

Hearing Date: January 29, 2026
Hearing Time: 8:30 a.m.
Courtroom: 9D
Judge: Hon. George H. Wu

1 I, Kristen McCallion, hereby declare:

2 1. I am an attorney with the law firm Fish & Richardson P.C. and counsel
3 for Defendants Tesla, Inc. and Elon Musk (collectively, “Defendants”) in this
4 action. I have personal knowledge of the facts contained in this declaration and, if
5 called upon to do so, I could and would testify competently to the matters herein.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of “The Matrix
7 (1999),” imdb.com, available at
8 [https://www.imdb.com/title/tt0133093/mediaviewer/rm525547776/?ref=ext_shr_in](https://www.imdb.com/title/tt0133093/mediaviewer/rm525547776/?ref=ext_shr_in_k)
9 [k](https://www.imdb.com/title/tt0133093/mediaviewer/rm525547776/?ref=ext_shr_in_k), last visited 12/15/2025.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of “Fallout:
11 New Vegas, Bethesda Softworks (2010),” cbr.com, available at
12 <https://www.cbr.com/fallout-new-vegas-letting-go/>, last visited 12/15/2025.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of “The Dark
14 Tower - The Gunslinger,” stephenking.com, available at
15 [https://stephenking.com/darktower/book/the_dark_tower_i_the_gunslinger_\(revised](https://stephenking.com/darktower/book/the_dark_tower_i_the_gunslinger_(revised).html)
16 [\).html](https://stephenking.com/darktower/book/the_dark_tower_i_the_gunslinger_(revised).html), last visited 12/15/2025.

17 5. Attached hereto as **Exhibit 4** is a true and correct copy of “I, Robot
18 (2004),” imdb.com, available at
19 https://www.imdb.com/title/tt0343818/plotsummary/?ref=tt_str_y_pl#synopsis, last
20 visited 12/15/2025.

21 6. Attached hereto as **Exhibit 5** is a true and correct copy of “I, Robot
22 misses Asimov’s complexity movie review,” rogerebert.com, available at
23 <https://www.rogerebert.com/reviews/i-robot-2004>, last visited 12/15/2025.

24 7. Attached hereto as **Exhibit 6** is a true and correct copy of “The Book of
25 Eli (2010),” imdb.com, available at
26 [https://www.imdb.com/title/tt1037705/mediaviewer/rm316793601/?ref=ext_shr_in](https://www.imdb.com/title/tt1037705/mediaviewer/rm316793601/?ref=ext_shr_in_k)
27 [k](https://www.imdb.com/title/tt1037705/mediaviewer/rm316793601/?ref=ext_shr_in_k), last visited 12/15/2025.
28

1 8. Attached hereto as **Exhibit 7** is a true and correct copy of “The Book of
2 Eli (2010),” imdb.com,
3 https://www.imdb.com/title/tt1037705/plotsummary/?ref=tt_str_y_pl#synopsis, last
4 visited 12/15/2025.

5 9. Attached hereto as **Exhibit 8** is a true and correct copy of “The Book of
6 Eli (2010),” imdb.com, available at
7 [https://www.imdb.com/title/tt1037705/mediaviewer/rm3998584320/?ref=ext_shr_l](https://www.imdb.com/title/tt1037705/mediaviewer/rm3998584320/?ref=ext_shr_lnk)
8 [nk](https://www.imdb.com/title/tt1037705/mediaviewer/rm3998584320/?ref=ext_shr_lnk), last visited 12/15/2025.

9 10. Attached hereto as **Exhibit 9** is a true and correct copy of “Denzel
10 Washington in a World Where It Pays to be a Loner,” nytimes.com, available at
11 <https://www.nytimes.com/2010/01/15/movies/15eli.html>, last visited 12/15/2025.

12 11. Attached hereto as **Exhibit 10** is a true and correct copy of “Dresden
13 Files – Jim Butcher,” jim-butcher.com, available at [https://www.jim-](https://www.jim-butcher.com/books/dresden)
14 [butcher.com/books/dresden](https://www.jim-butcher.com/books/dresden), last visited 12/15/2025.

15 12. Attached hereto as **Exhibit 11** is a true and correct copy of “Jim
16 Butcher talks about his character Harry Dresden – Dresden Files,” strandmag.com,
17 available at <https://strandmag.com/theres-something-about-harry-dresden/>, last
18 visited 12/15/2025.

19 13. Attached hereto as **Exhibit 12** is a true and correct copy of “Minority
20 Report (2002),” imdb.com, available at
21 https://www.imdb.com/title/tt0181689/plotsummary/?ref=tt_str_y_pl#synopsis, last
22 visited 12/15/2025.

23 14. Attached hereto as **Exhibit 13** is a true and correct copy of “Tom
24 Cruise Minority Report,” latimes.com, available at
25 [https://www.latimes.com/entertainment-arts/movies/newsletter/2025-05-](https://www.latimes.com/entertainment-arts/movies/newsletter/2025-05-16/minority-report-tom-cruise-you-must-remember-this-karina-longworth-such-good-friends-rich-and-famous-red-line-7000-liberation-of-lb-jones-going-down-chung-mong-hung-nymphomaniac-lars-von-trier)
26 [16/minority-report-tom-cruise-you-must-remember-this-karina-longworth-such-](https://www.latimes.com/entertainment-arts/movies/newsletter/2025-05-16/minority-report-tom-cruise-you-must-remember-this-karina-longworth-such-good-friends-rich-and-famous-red-line-7000-liberation-of-lb-jones-going-down-chung-mong-hung-nymphomaniac-lars-von-trier)
27 [good-friends-rich-and-famous-red-line-7000-liberation-of-lb-jones-going-down-](https://www.latimes.com/entertainment-arts/movies/newsletter/2025-05-16/minority-report-tom-cruise-you-must-remember-this-karina-longworth-such-good-friends-rich-and-famous-red-line-7000-liberation-of-lb-jones-going-down-chung-mong-hung-nymphomaniac-lars-von-trier)
28 [chung-mong-hung-nymphomaniac-lars-von-trier](https://www.latimes.com/entertainment-arts/movies/newsletter/2025-05-16/minority-report-tom-cruise-you-must-remember-this-karina-longworth-such-good-friends-rich-and-famous-red-line-7000-liberation-of-lb-jones-going-down-chung-mong-hung-nymphomaniac-lars-von-trier), last visited 12/15/2025.

1 15. Attached hereto as **Exhibit 14** is a true and correct copy of “Minority
2 Report – Rotten Tomatoes,” rottentomatoes.com, available at
3 https://www.rottentomatoes.com/tv/minority_report, last visited 12/15/2025.

4 16. Attached hereto as **Exhibit 15** is a true and correct copy of “Review in
5 Minority Report – a Case of Precognitive Dissonance,” nytimes.com, available at
6 [https://www.nytimes.com/2015/09/19/arts/television/review-in-minority-report-a-](https://www.nytimes.com/2015/09/19/arts/television/review-in-minority-report-a-case-of-precognitive-dissonance.html)
7 [case-of-precognitive-dissonance.html](https://www.nytimes.com/2015/09/19/arts/television/review-in-minority-report-a-case-of-precognitive-dissonance.html), last visited 12/15/2025.

8 17. Attached hereto as **Exhibit 16** is a true and correct copy of “Dystopia –
9 TV Tropes,” tvtropes.com, available at
10 <https://tvtropes.org/pmwiki/pmwiki.php/Main/Dystopia>, last visited 12/15/2025.

11 18. Attached hereto as **Exhibit 17** is a true and correct copy of “High
12 Plains Drifter (1973),” imdb.com, available at
13 [https://www.imdb.com/title/tt0068699/mediaviewer/rm1878002689/?ref=ext_shr_l](https://www.imdb.com/title/tt0068699/mediaviewer/rm1878002689/?ref=ext_shr_lnk)
14 [nk](https://www.imdb.com/title/tt0068699/mediaviewer/rm1878002689/?ref=ext_shr_lnk), last visited 12/15/2025.

15 19. Attached hereto as **Exhibit 18** is a true and correct copy of “Pale Rider
16 (1985),” imdb.com, available at
17 [https://www.imdb.com/title/tt0089767/mediaviewer/rm3589190401/?ref=ext_shr_l](https://www.imdb.com/title/tt0089767/mediaviewer/rm3589190401/?ref=ext_shr_lnk)
18 [nk](https://www.imdb.com/title/tt0089767/mediaviewer/rm3589190401/?ref=ext_shr_lnk), last visited 12/15/2025.

19 20. Attached hereto as **Exhibit 19** is a true and correct copy of “Once Upon
20 a Time in the West (1986),” imdb.com, available at
21 [https://www.imdb.com/title/tt0064116/mediaviewer/rm859539970/?ref=ext_shr_ln](https://www.imdb.com/title/tt0064116/mediaviewer/rm859539970/?ref=ext_shr_lnk)
22 [k](https://www.imdb.com/title/tt0064116/mediaviewer/rm859539970/?ref=ext_shr_lnk), last visited 12/15/2025.

23 21. Attached hereto as **Exhibit 20** is a true and correct copy of “The
24 Terminator (1984),” imdb.com, available at
25 https://www.imdb.com/title/tt0088247/plotsummary/?ref=tt_str_y_pl#synopsis, last
26 visited on 12/15/2025.

27 22. Attached hereto as **Exhibit 21** is a true and correct copy of “30 Minutes
28 on The Terminator,” rogerebert.com, available at

1 <https://www.rogerebert.com/mzs/30-minutes-on-the-terminator>, last visited on
2 12/15/2025.

3 23. Attached hereto as **Exhibit 22** is a true and correct copy of “Westworld
4 at 50 – Michael Crichton Bleak Vision of AI remains chilling,” theguardian.com,
5 <https://www.theguardian.com/film/2023/aug/17/westworld-ai-michael-crichton>, last
6 visited on 12/15/2025.

7 24. Attached hereto as **Exhibit 23** is a true and correct copy of “Westworld
8 (1973),” imdb.com, available at
9 https://www.imdb.com/title/tt0070909/plotsummary/?ref_=tt_stry_pl#synopsis, last
10 visited 12/15/2025.

11 25. Attached hereto as **Exhibit 24** is a true and correct copy of “Dredd
12 (2012),” imdb.com, available at
13 https://www.imdb.com/title/tt1343727/plotsummary/?ref_=tt_stry_pl#synopsis, last
14 visited 12/15/2025.

15 26. Attached hereto as **Exhibit 25** is a true and correct copy of “X-Men:
16 Days of Future Past (2014),” imdb.com, available at
17 https://www.imdb.com/title/tt1877832/plotsummary/?ref_=tt_stry_pl#synopsis, last
18 visited 12/15/2025.

19 27. Attached hereto as **Exhibit 26** is a true and correct copy of
20 “Dystopian,” *Merriam-Webster Dictionary*, available at [https://www.merriam-](https://www.merriam-webster.com/dictionary/dystopian)
21 [webster.com/dictionary/dystopian](https://www.merriam-webster.com/dictionary/dystopian), last visited 12/15/2025.

22 28. Attached hereto as **Exhibit 27** is a true and correct copy of “Badass
23 Longcoat – TV Tropes,” tvtropes.com, available at
24 <https://tvtropes.org/pmwiki/pmwiki.php/Main/BadassLongcoat>, last visited
25 12/15/2025.

26 29. Attached hereto as **Exhibit 28** is a true and correct copy of “Resident
27 Evil: Extinction (2007),” imdb.com, available at
28

1 https://www.imdb.com/title/tt0432021/mediaviewer/rm955159552/?ref=ext_shr_ln
2 [k](#), last visited 12/15/2025.

3 30. Attached hereto as **Exhibit 29** is a true and correct copy of “Mad Max:
4 Fury Road (2015),” imdb.com, available at
5 https://www.imdb.com/title/tt1392190/mediaviewer/rm801511937/?ref=ext_shr_ln
6 [k](#), last visited 12/15/2025.

7 31. Attached hereto as **Exhibit 30** is a true and correct copy of “I am
8 Legend (2007),” imdb.com, available at
9 https://www.imdb.com/title/tt0480249/mediaviewer/rm3931047424/?ref=ext_shr_l
10 [nk](#), last visited 12/15/2025.

11
12 I declare under penalty of perjury that the foregoing is true and correct.
13 Executed this 15th day of December 2025.

14
15 By: /s/ Kristen McCallion
16 Kristen McCallion
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